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Attorneys for Non-Parties
SANDSTONE GROUP, LLC,
TYTO LIDAR, LLC, and
OGNEN STOJANOVSKI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING LLC

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ADRIAN J. SAWYER
IN SUPPORT OF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS MOTION TO
COMPEL DEPOSITIONS, OVERRULE
OBJECTIONS, COMPEL
INTERROGATORIES, AND COMPEL
SUPPLEMENTAL 30(B)(6) WITNESS
(DKT. 1789)**

1 I, Adrian J. Sawyer, hereby declare as follows:

2 1. I am an attorney licensed to practice before all courts of the State of California. I
3 am a partner in the law firm of Kerr & Wagstaffe LLP, attorneys for non-parties Sandstone
4 Group, LLC, Tyto LiDAR, LLC, and Ognen Stojanovski. I have personal knowledge of the
5 matters stated herein and if called upon would testify competently thereto.

6 2. I make this declaration in support of Plaintiff Waymo LLC's Administrative
7 Motion to File Under Seal Its Motion to Compel Depositions, Overrule Objections, Compel
8 Interrogatories, and Compel Supplemental 30(B)(6) Witness (Dkt. 1789). I have reviewed the
9 Administrative Motion to File Under Seal (the "Administrative Motion"), together with
10 Waymo's Motion to Compel Depositions, Overrule Objections, Compel Interrogatories, and
11 Compel Supplemental 30(B)(6) Witness ("Motion to Compel") (Dkt. 1789-10), and the exhibits
12 to the Motion to Compel sought to be filed under seal.

13 3. Tyto LiDAR and Sandstone are non-parties and are existing limited liability
14 companies. All of the information designated by Tyto LiDAR and Sandstone and included in the
15 Motion to Compel was designated confidential. None of the information was designated highly
16 confidential/AEO by Tyto LiDAR or Sandstone.

17 4. Footnote 1 of the Motion to Compel brief contains confidential proprietary and
18 operational information of Tyto LiDAR. Because Tyto LiDAR is a non-party and existing
19 private company, it requests that its confidentiality interests in this information be respected in
20 this proceeding.

21 5. Exhibit 20 to the Motion to Compel is a Secondment Agreement between
22 Dogwood Leasing, LLC and Odin Wave, LLC, subsequently known as Tyto LiDAR. Exhibit 20
23 contains confidential proprietary and operational information of Tyto LiDAR, including
24 information related to development of its prototype LiDAR sensor and its management policies.
25 Because Tyto LiDAR is a non-party and existing private company, it requests that its
26 confidentiality interests in this information be respected in this proceeding.

27 6. Exhibit 21 to the Motion Compel is an excerpt of the deposition transcript of
28 Asheem Linaval. Exhibit 21 contains confidential proprietary and operational information of

1 Tyto LiDAR, including information related to development of its prototype LiDAR sensor and
2 its management and employment policies. Because Tyto LiDAR is a non-party and existing
3 private company, it requests that its confidentiality interests in this information be respected in
4 this proceeding.

5 7. Exhibit 22 to the Motion to Compel is a flow chart, bates labeled
6 STROZ_R_000002173. Exhibit 22 contains confidential proprietary information of Odin Wave,
7 LLC subsequently known as Tyto LiDAR, Tyto LiDAR, and Sandstone, all which is related to
8 the ownership structure of such entities. Because Tyto LiDAR and Sandstone are non-parties and
9 existing private companies, they request that their confidentiality interests in this information be
10 respected in this proceeding.

11 8. Waymo's request to seal is narrowly tailored to those exhibits to Waymo's
12 Response that merit sealing.

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct. Executed this 29th day of September, 2017 at San Francisco,
15 California.

16 /s/ Adrian J. Sawyer

17 ADRIAN J. SAWYER
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